

July 19, 2024

BY CM/ECF

The Honorable Jessica G. L. Clarke
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
Room 1040
New York, NY 10007

NICOLLE JACOBY

Nicolle.Jacoby@dechert.com
+1 212 698 3820 Direct
+1 212 698 0470 Fax

Re: *eShares, Inc. d/b/a Carta, Inc. v. Jerry O. Talton, III*, No. 1:22-cv-10987 (JGLC)

Dear Judge Clarke:

We represent Plaintiff eShares, Inc. d/b/a Carta, Inc. (“Carta”) and Counterclaim Defendant Henry Ward (“Ward”) in the above-captioned action. Consistent with Rule 5(d) of the Court’s Individual Rules and Practices in Civil Cases, we write today to request leave to redact Carta and Ward’s Reply in Support of Their Motion to Dismiss and Motion to Strike (the “Brief”). The Brief was filed with Carta and Ward’s proposed redactions. *See* ECF No. 108. An unredacted version of the Brief has been filed under seal. *See* ECF No. 110.

The few redactions in the Brief all relate to a non-party whose privacy interests strongly weigh against public identification. Carta and Ward fully briefed this issue in support of its redactions to Talton’s Amended Counterclaim. *See* ECF No. 90 at 2–3; ECF No. 95 at 1–2. Because the individual whose identity Carta seeks to redact in the Brief is one of the individuals whose identity Carta and Ward redacted in Talton’s Second Amended Counterclaim, Carta and Ward respectfully incorporate by reference their arguments in support of protecting the name and identifying information of this individual.

Accordingly, Carta and Ward respectfully request that the Court approve Carta and Ward’s redactions in the Brief.

Sincerely,

Nicolle L. Jacoby
Nicolle L. Jacoby

CC: All Counsel of Record via CM/ECF